

## **REMARKS**

Claims 7-13, 15-23, and 24-41 have been canceled, with traverse, pursuant to a restriction election and Applicants reserve the right to assert these claims in any future divisional, continuation, or continuation-in-part applications.

Applicants appreciate the Examiner's courtesy of allowing a written reply to the instant restriction election requirement.

The Examiner's requirement for restriction is as follows:

- A. Claims 1-23, drawn to a method and apparatus for trading in gas, classified in class 705, subclass 37.
- B. Claims 24-41, drawn to a system for storing gas in an underground salt formation, classified in class 405, subclass 53.

Further, if Applicants elected what the Examiner alleged as invention A, the Examiner required a species election as follows:

Species 1: Claims 1-6 and 14

Species 2: Claims 7-13 and 15-23

Applicants respectfully elect, with traverse, the prosecution of Claims 1-6 and 14 for alleged Invention A, Species 1 as identified by the Examiner.

Applicants respectfully disagree with the Examiner's allegation that the application should be separated into two distinct inventions and two species of one of the inventions. Each of the alleged separate inventions relate to methods and systems for short term gas storage for gas trading. The use of the shallow underground storage is an efficient way of quickly storing and accessing the gas for trading. The shallow underground storage allows the easy movement of gas to and from the storage facility without the need of expensive pumping and compression facilities. Applicants respectfully submit that the use of conventional above ground storage tanks or conventional deeper salt formation storage facilities would defeat the purpose of Applicants' method and system as such conventional facilities would require much more time and expense to attempt to quickly move gas in and out of the storage facility. Such time and expense would include, but not be limited to, larger and more expensive pumping and compression facilities along with the need for manpower for operation and maintenance along with requirements for gas drying and other gas treatments (both for moving gas into the storage and out of the storage). Applicants further submit that the instant application, as a whole, describes and claims an

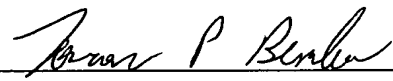
improved gas movement facility that greatly improves short term trading ability. By definition, a system comprises of many components that work in concert to create the system. Therefore, Applicants respectfully ask that the Examiner reconsider the instant restriction requirement.

Conclusion

In light of the above restriction election, with traverse, Applicants respectfully submit that the application now stands in formal condition for allowance and courteously ask for this application be advanced to issue. Although Applicants believe that no additional fees, beyond the two month extension request fee are required, the Commissioner is hereby respectfully authorized to deduct such fees, as might be required, from Deposit Account Number 13-2166. The Examiner is respectfully invited to call the Applicants' representative, Taras P. Bemko, at 713-355-4200, to discuss any matters, that may arise, where such discussion may resolve such matters and place this application in condition for allowance.

Respectfully Submitted,

Date June 14, 2007

  
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